

**Element Performance Inspection (EPI) Data Collection Tool**  
**1.3.6 Airworthiness Directives and Maintenance Record Requirements (AW)**  
**Revision#:3 Revision Date:09/15/2009**

**ELEMENT SUMMARY INFORMATION**

**Scope of Element:**

**Purpose** (operator's responsibility): To establish a process that ensures compliance with Airworthiness Directives and Maintenance Recording Requirements.

**Objective** (FAA oversight responsibility): To determine:

- The effectiveness of the operator's procedures in meeting the desired output of the process,
- If the operator follows its procedures, controls, process measurements, and interfaces, and
- If there were any changes in the personnel identified by the operator as having responsibility and/or authority, for Airworthiness Directives and Maintenance Recording Requirements.

**Specific Instructions:**

Intentionally left blank

**Related EPIs:**

Intentionally left blank

**SUPPLEMENTAL INFORMATION**

**Regulatory Requirements:**

A.447, Operations Specifications  
39.17, What must I do if a change in a product affects my ability to accomplish the actions required in an airworthiness directive  
39.19, May I address the unsafe condition in a way other than that set out in the airworthiness directive  
39.27, What do I do if the airworthiness directive conflicts with the service document on which it is based  
119.43, Certificate holder's duty to maintain operations specifications.  
121.135, Manual contents  
121.373, Continuing analysis and surveillance.  
121.380, Maintenance recording requirements.

**Related CFRs & FAA Policy/Guidance:**

**Related CFRs:**

Intentionally left blank

**FAA Policy/Guidance:**

FAA Order 8900.1, Volume 3, Chapter 31, Section 5  
AC 39-7C, Airworthiness Directives  
AC 120-16E, Air Carrier Maintenance Programs

EPI SECTION 1 - PERFORMANCE OBSERVABLES	
<b>Objective:</b> The tasks and questions in this section of the EPI are designed to assist in determining if the operator follows its written procedures and controls and meets the established performance measures of the process. The initial series of questions address the output(s) of the process and the last several questions address whether or not various aspects of the process were followed.	
<b>Tasks</b>	
	The inspector shall accomplish the following tasks:
1	Review the information listed in the Supplemental Information Section of this DCT.
2	Review policies, procedures, instructions, and information for this element.
3	Review the most recently accomplished Safety Attribute Inspection (SAI) for this element.
4	Observe the performance of this element to gain an understanding of the procedures, instructions, and information.
5	Discuss this element with the personnel who perform the duties and responsibilities required by the process.

Questions		
1.1	Did the operator's list of applicable Airworthiness Directive (AD) include all ADs issued on their aircraft, aircraft engines, appliances and if applicable propellers?  Updated: Rev # 3 on 09/15/2009 Kind Of Question: Flag, Supplemental, Domestic  <i>Related Performance JTIs:</i> 1. Verify that, if an airworthiness directive incorporates by reference a manufacturer's service document, that the requirements of the airworthiness directive were followed, even if there is a conflict between the service document and the airworthiness directive. (JTI ID: 15) <i>Sources:</i> 121.135(a)(1); 39.27	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Observable
1.2	Did a visual inspection verify the observed aircraft, aircraft engines, appliances, and propellers were in compliance with applicable Airworthiness Directives (AD)?  Updated: Rev # 3 on 09/15/2009 Kind Of Question: Flag, Supplemental, Domestic	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Observable
1.3	Were the operator's AD accomplishment records accurate?  Updated: Rev # 3 on 09/15/2009 Kind Of Question: Flag, Supplemental, Domestic  <i>Related Performance JTIs:</i> 1. Verify that the recording requirements for checks performed by pilots, as permitted by airworthiness directives, were accomplished in accordance	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Observable

	<p>with the operator's design. (JTI ID: 16)  <i>Sources:</i> AC 39-7C, Paragraph 13f</p> <p>2. Verify that airworthiness directives were accomplished as scheduled in accordance with the operator's design. (JTI ID: 19)  <i>Sources:</i> 121.135(a)(1); 121.380(a)(2)(vi)</p> <p>3. Verify that airworthiness directives that require recurring action, are scheduled in accordance with the operator's design. (JTI ID: 20)  <i>Sources:</i> 121.135(a)(1); 121.380(a)(2)(vi)</p> <p>4. Verify that airworthiness directive records containing current status of applicable airworthiness directives are transferred with the aircraft when sold in accordance with the operator's design. (JTI ID: 25)  <i>Sources:</i> 121.135(a)(1); 121.380(a)(2)(vi); 121.380(c)(3)</p> <p>5. Verify that the records of accomplishment for products (aircraft, aircraft engine, propeller, or appliance) with airworthiness directives, were made(using the operator's design specified in their manual required in FAR 121.369) to show; that inspections were carried out, conditions and limitations were complied with, and all required actions to resolve the unsafe condition specified in the airworthiness directives were accomplished and recorded, and that all requirements for the issuance of an airworthiness release under Sec 121.709 were met in accordance with the operator's design. (JTI ID: 48)  <i>Sources:</i> 121.135(a)(1); 121.369; 121.380; 121.709; AC 39-7C; AC 120-16E; 8900.1 Volume 3, Chapter 31, Section 5</p>	
1.4	<p>Do the operator's records show the current status of applicable airworthiness directives, including the date and methods of compliance, and if the airworthiness directive involves recurring action, the time and date when the next action is required?</p> <p>Updated: Rev # 3 on 09/15/2009  Kind Of Question: Flag, Supplemental, Domestic</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Observable
1.5	<p>Were the observed actions performed as specified in the airworthiness directive?</p> <p>Updated: Rev # 3 on 09/15/2009  Kind Of Question: Flag, Supplemental, Domestic</p> <p><i>Related Performance JTIs:</i></p> <p>1. Check at the aircraft; that inspections that must be carried out, conditions and limitations that must be complied with, and all required actions to resolve the unsafe condition specified in an airworthiness directive were accomplished in accordance with the operator's design. (JTI ID: 45)</p> <p>2. Check at the operator's maintenance facility; that inspections that must be carried out, conditions and limitations that must be complied with, and all required actions to resolve the unsafe condition specified in an airworthiness directive were accomplished in accordance with the operator's design. (JTI ID: 47)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Observable
1.6	<p>Were AD requirements properly accomplished, regardless of who did the work?</p> <p>Updated: Rev # 3 on 09/15/2009  Kind Of Question: Flag, Supplemental, Domestic</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Observable

1.7	<p>If an individual product has changed in a way that affected the ability to accomplish the actions required by an AD, did the operator obtain an approved alternate method of compliance?</p> <p>Updated: Rev # 3 on 09/15/2009 Kind Of Question: Flag, Supplemental, Domestic</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Observable
1.8	<p>If an alternate method of compliance was granted, was it done with the principal inspector's full knowledge?</p> <p>Updated: Rev # 3 on 09/15/2009 Kind Of Question: Flag, Supplemental, Domestic</p> <p><i>Related Performance JTIs:</i></p> <ol style="list-style-type: none"> <li>1. Verify that a request for approval from the FAA for an alternate method of compliance (AMOC) to an airworthiness directive was submitted to the assigned principal inspector for concurrence and the manager of the office identified in the airworthiness directive for approval, in accordance with the operator's design. (JTI ID: 9) <i>Sources:</i> 121.135(a)(1); 39.19</li> </ol>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Observable
1.9	<p>Did the operator obtain Aircraft Certification Office (ACO) approval for change in compliance time if the aircraft is operated differently than AD limitation requirements?</p> <p>Updated: Rev # 3 on 09/15/2009 Kind Of Question: Flag, Supplemental, Domestic</p> <p><i>Related Performance JTIs:</i></p> <ol style="list-style-type: none"> <li>1. Verify that a request for approval from the FAA for a change of compliance time to an airworthiness directive provided a level of safety and was approved by the manager of the office identified in the airworthiness directive, and the approval was obtained in accordance with the operator's design. (JTI ID: 10) <i>Sources:</i> 121.135(a)(1); 39.19</li> </ol>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Observable
1.10	<p>Did the operator appropriately confirm receipt of all Emergency ADs received that affect an aircraft type in its fleet?</p> <p>Updated: Rev # 3 on 09/15/2009 Kind Of Question: Flag, Supplemental, Domestic</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Observable
1.11	<p>Do the operator records show that all requirements for the issuance of an airworthiness release under 14 CFR part 121.709 have been met?</p> <p>Updated: Rev # 3 on 09/15/2009 Kind Of Question: Flag, Supplemental, Domestic</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Observable
1.12	<p>Does the operator retain the records for the issuance of an airworthiness release until the work is repeated or superseded by other work or for one year after the work is performed?</p> <p>Updated: Rev # 3 on 09/15/2009 Kind Of Question: Flag, Supplemental, Domestic</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Observable

1.13	<p>Do the operator's records show the total time in service of each airframe, engine, and if applicable propeller?</p> <p>Updated: Rev # 3 on 09/15/2009 Kind Of Question: Flag, Supplemental, Domestic</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Observable
1.14	<p>Do the operator's records show the current status of life-limited parts of each airframe, engine, appliance, and if applicable propeller?</p> <p>Updated: Rev # 3 on 09/15/2009 Kind Of Question: Flag, Supplemental, Domestic</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Observable
1.15	<p>Do the operator records show the time since last overhaul of all items installed on the aircraft which are required to be overhauled on a specified time basis?</p> <p>Updated: Rev # 3 on 09/15/2009 Kind Of Question: Flag, Supplemental, Domestic</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Observable
1.16	<p>Does the operator retain records of the time since the last overhaul until the work is superseded by work of equivalent scope and detail?</p> <p>Updated: Rev # 3 on 09/15/2009 Kind Of Question: Flag, Supplemental, Domestic</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Observable
1.17	<p>Do the operator's records show the current inspection status of its aircraft and appliances, including the times since the last inspection?</p> <p>Updated: Rev # 3 on 09/15/2009 Kind Of Question: Flag, Supplemental, Domestic</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Observable
1.18	<p>Do the operator's records show a list of current major alterations to each airframe, engine, appliance and if applicable propeller?</p> <p>Updated: Rev # 3 on 09/15/2009 Kind Of Question: Flag, Supplemental, Domestic</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Observable
1.19	<p>Does the operator make available all records required by 14 CFR part 121.380 for inspection by the Administrator or authorized representative of the NTSB?</p> <p>Updated: Rev # 3 on 09/15/2009 Kind Of Question: Flag, Supplemental, Domestic</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Observable
1.20	<p>Did the operator follow policies, procedures, instructions, and information for this element?</p> <p>Updated: Rev # 3 on 09/15/2009 Kind Of Question: Flag, Supplemental, Domestic</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Observable
1.21	<p>Did the operator follow controls for this element?</p> <p>Updated: Rev # 3 on 09/15/2009 Kind Of Question: Flag, Supplemental, Domestic</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Observable
1.22	<p>Did the records for this element comply with the instructions?</p> <p>Updated: Rev # 3 on 09/15/2009 Kind Of Question: Flag, Supplemental, Domestic</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Observable

1.23	<p>Were the process measurements for this element:</p> <ul style="list-style-type: none"> <li>• Effective in identifying actual or potential problems, and</li> <li>• Did the operator identify and take corrective action for identified problems?</li> </ul> <p>Updated: Rev # 3 on 09/15/2009 Kind Of Question: Flag, Supplemental, Domestic</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Observable
1.24	<p>Were the observed interfaces identified and documented by the operator?</p> <p>Updated: Rev # 3 on 09/15/2009 Kind Of Question: Flag, Supplemental, Domestic</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Observable
1.25	<p>Were the observed interfaces, identified and documented by the operator, adequate to ensure that the intended results were achieved?</p> <p>Updated: Rev # 3 on 09/15/2009 Kind Of Question: Flag, Supplemental, Domestic</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Observable

<b>EPI SECTION 1 - PERFORMANCE OBSERVABLES</b> <b>Drop-Down Menu</b>	
1.	Personnel.
2.	Tools and Equipment.
3.	Technical Data.
4.	Policies, procedures, instructions, or information.
5.	Materials.
6.	Facilities.
7.	Controls.
8.	Process Measures.
9.	Interfaces.
10.	Desired Outcome.
11.	Other.

## EPI SECTION 2 - MANAGEMENT RESPONSIBILITY & AUTHORITY OBSERVABLES

### Objective:

Answers to questions in this section address the responsibility and authority of the people who manage this process. They will help determine if there is a qualified and knowledgeable person who:

- Is responsible for the process
- Is answerable for the quality of the process
- Has the authority to establish and modify the process.

Note: The person with the authority may or may not be the person with the responsibility.

### Tasks

	The inspector shall accomplish the following tasks:
1	Identify the person who has overall responsibility for the processes associated with this element.
2	Identify the person who has overall authority for the processes associated with this element.
	Note: If there have been no major changes in key personnel or the program since the last SAI or EPI was accomplished, then only answer questions 1 and 2 below, and select "No Change" (N/C) for the remaining questions. If changes have occurred that affect the responsibility or authority attributes for this element, then accomplish all tasks and answer all questions.
3	Review the duties and responsibilities for the person(s) who manage the processes associated with this element.
4	Review the appropriate organizational chart.
5	Discuss the processes associated with this element with the management personnel identified in tasks 1 and 2.
6	Review the qualifications and work experience of the management personnel identified in tasks 1 & 2.

### Questions

2.1	Is the identified person who is responsible for the quality of the processes associated with this element actively filling that position?  Updated: Rev # 3 on 09/15/2009 Kind Of Question: Flag, Supplemental, Domestic	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Observable
2.2	Is the identified person who has authority to establish and modify the operator's policies, procedures, instructions and information for the processes associated with this element actively filling that position?  Updated: Rev # 3 on 09/15/2009 Kind Of Question: Flag, Supplemental, Domestic	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Observable
2.3	Does the responsible person know that he/she has responsibility for the processes associated with this element?  Updated: Rev # 3 on 09/15/2009	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Observable



	Kind Of Question: Flag, Supplemental, Domestic	
2.4	Does the person with authority know that he/she has authority for the processes associated with this element?  Updated: Rev # 3 on 09/15/2009 Kind Of Question: Flag, Supplemental, Domestic	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Observable
2.5	Does the person with responsibility for the processes associated with this element meet the qualification and work experience standards?  Updated: Rev # 3 on 09/15/2009 Kind Of Question: Flag, Supplemental, Domestic	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Observable
2.6	Does the person with authority to establish and modify the processes associated with this element meet the qualification and work experience standards?  Updated: Rev # 3 on 09/15/2009 Kind Of Question: Flag, Supplemental, Domestic	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Observable
2.7	Does the person with responsibility understand the controls, process measurements, and interfaces associated with this element?  Updated: Rev # 3 on 09/15/2009 Kind Of Question: Flag, Supplemental, Domestic	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Observable
2.8	Does the person with authority understand the controls, process measurements, and interfaces associated with this element?  Updated: Rev # 3 on 09/15/2009 Kind Of Question: Flag, Supplemental, Domestic	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Observable
2.9	Does the person with responsibility know who has authority to establish and modify the processes associated with this element?  Updated: Rev # 3 on 09/15/2009 Kind Of Question: Flag, Supplemental, Domestic	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Observable
2.10	Does the person with authority know who has the responsibility for the processes associated with this element?  Updated: Rev # 3 on 09/15/2009 Kind Of Question: Flag, Supplemental, Domestic	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Observable

EPI SECTION 2 - MANAGEMENT RESPONSIBILITY & AUTHORITY OBSERVABLES Drop-Down Menu	
1.	Assignment of responsibility.
2.	Assignment of authority.
3.	Does not understand policies, procedures, instructions, or information.
4.	Does not understand controls.
5.	Does not understand process measurements.
6.	Does not understand interfaces.
7.	Span of control.
8.	Position vacant.
9.	Other.

